

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALBERTO L. GONZALEZ,  
Plaintiff,

TIMOTHY DOOLING, et al  
Defendants.

CIVIL ACTION NO. 11-CV-30271

**PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS OR, IN  
THE ALTERNATIVE, FOR AN IN CAMERA INSPECTION OF DOCUMENTS**

Plaintiff Alberto Gonzalez, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure, moves the Court for an order compelling Defendant Heather Hall to produce documents withheld on the grounds of privilege or, in the alternative, for an *in camera* inspection of particular documents. This motion is made on the basis that the requested documents are non-privileged and are reasonably calculated to lead to the discovery of admissible evidence. Further, Plaintiff requests and Order requiring Defendant Hall to pay the reasonable expenses and attorney fees incurred in the preparation and presentation of this motion. In support, Plaintiff states as follows:

**I. BACKGROUND**

This is a civil rights lawsuit to redress harms suffered by Alberto Gonzalez as a result of the unlawful imposition and enforcement of a sentence of Community Parole Supervision for Life ("CPSL") by employees of the Massachusetts Parole Board ("the Board"). The Claims against Defendants divide roughly into two categories. First, that Defendants Dooling, Pease, Stone, Talbot, Hall, Book, Goldman, and Howard-Hogan ("the Legal Unit defendants"),